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ATTORNEY AT LAW

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*SENT VIA EMAIL*

Re: *Zinksy v. Russin et al.*  
No. 2:22-cv-547  
Plaintiff's Second Set of Supplemental Discovery Responses

Dear Mr. Webb,

Please allow this correspondence to supplement Plaintiff's discovery responses. More specifically, Plaintiff's Supplemental Answer to Defendant Russin's Interrogatory No. 1 is as follows:

**I. PLAINTIFF'S SUPPLEMENTAL ANSWER to DEFENDANT RUSSIN'S INTERROGATORY No. 1:**

In addition to the 43 witnesses previously identified in Plaintiff's Initial Disclosures and Answers to Interrogatories, Plaintiff identifies the following 11 witness who have knowledge of Defendant Russin's unethical and inappropriate behavior while working for American Income Life Insurance Company ("AIL"):

1. Micalyn Antonacci
2. Andrew Koman
3. Kayla Le
4. Pedros Lemos
5. Rob Martik
6. Michael May
7. Patrick Minenok
8. Rob Novak
9. Cyndi Sittig
10. Lindsay Spinks
11. Katie Scuillo
12. Kyle Wrobel

**II. PLAINTIFF'S SECOND SUPPLEMENTAL RESPONSE TO DEFENDANT RUSSIN'S REQUEST FOR PRODUCTION No. 1:**

In addition to Plaintiff's Responses to Defendant Russin's Request for Production of Documents, Plaintiff identifies the following documents and video recordings in support of her claims pending against Defendant Russin as follows:

**A. Documents:**

1. [Arias 000001 – Arias 000324];
2. [Phillips Murrah\_000001 – Phillips Murrah\_000202];
3. [ZINSKY001712 - ZINSKY000910]; and,
4. Deposition Exhibits.

**B. Video Recordings:**

1. Agency Cornhole Meeting
2. Arias What Costs You
3. Haak Agency Meeting
4. Jackson \$500k
5. Laylock Call Night
6. Laylock Office
7. RF 2021 LDS
8. RF Club Outing
9. RF Everyone Here at 8
10. RF Team Meeting Boyle House
11. Russin Its Gonna Get Real Interesting
12. Russin 911 Inside Job
13. Russin Cult Meeting
14. Susan Antilla, *Inside the Tawdry, Drug Fueled, Violent World of America's Top Life Insurance Salesmen*, February 28, 2023. <https://www.insider.com/globe-life-insurance-lawsuit-american-income-arias-agency-toxic-workplace-2023-1>
15. Vena Agency Meeting
16. Vena Agency Meeting 2

Finally, I continue to wait for Defendant Russin's outstanding discovery responses which you previously agreed to produce on multiple occasions to date. Specifically, I have yet to receive the following outstanding discovery responses on behalf of your client:

1. Defendant Russin's Answer to Plaintiff's Interrogatory No. 17;
2. Defendant Russin's Response to Plaintiff's Request for Production No. 26;
3. Defendant Russin's Response to Plaintiff's Request for Production No. 28;
4. Correspondence, including but not limited to electronic text messages between Defendant Russin and Simon Arias, per Defendant Russin's deposition testimony;
5. Correspondence, including but not limited to electronic messages between Defendant Russin and his AIL coworkers (about Plaintiff), per Defendant Russin's deposition testimony;
6. Documentation, including but not limited to Defendant Russin's personal bank statements, substantiating Defendant Russin's alleged financial assistance issued to Plaintiff; and,
7. Copies of Plaintiff's records which you represented having obtained via signed releases (Dr. Federoff, UPMC Passavant, Cranberry Psychological Center, Counseling and Wellness Center of Pittsburgh).

Please advise at your earliest convenience.

Sincerely,

/s/Amy N. Williamson, Esq.